

EXHIBIT 3

Deposition Excerpts of Darla Welker

Holliman, Michelle v. We Are Sharing Hope SC, et al

Page 1

STATE OF SOUTH CAROLINA COURT OF COMMON PLEAS
COUNTY OF CHARLESTON 9TH JUDICIAL CIRCUIT
MICHELLE CHA HOLLIMAN, individually and as personal
representative of the Estate of Allen B. Holliman,

Plaintiff,

vs. CASE NO. 2020-CP-10-2902

WE ARE SHARING HOPE SC, MEDICAL UNIVERSITY OF SOUTH
CAROLINA, and UNITED NETWORK FOR ORGAN SHARING,
Defendants.

VIDEOCONFERENCE

DEPOSITION OF: DARLA A. WELKER

DATE: December 14, 2020

TIME: 10:04 a.m.

LOCATION: Mount Pleasant, South Carolina

TAKEN BY: Counsel for the Plaintiff

REPORTED BY: MARIE H. BRUEGGER, RPR, CRR
(Appearing Via VTC)

1 and --

2 Q And what -- excuse me.

3 A And hemodiluted is clotted, so it
4 could be a bad sample that was drawn. I didn't
5 know at the time.

6 Q Did you look into why the VRL results
7 were indeterminate?

8 A No, not after we found --

9 Q Why not?

10 A Not after we found two samples that
11 were both resulted as an O from the hospital.

12 Q Do you think you should have looked
13 into why the VRL results came back indeterminate?

14 MS. CRAIG: Objection.

15 THE WITNESS: Perhaps in hindsight,
16 yes.

17 BY MS. DINKINS:

18 Q What can cause blood samples to be
19 hemodiluted?

20 A Depends on -- if the patient is
21 coagulopathic at the time, the sample can clot.

22 Q What does that mean, to be
23 coagulopathic?

24 A That means the patient is clotting too
25 fast. Their blood is clotting fast.

1 Q I'm not asking about for a particular
2 donor; I'm asking if that's something that can
3 affect the accuracy of blood typing results.

4 MS. CRAIG: And objection. Asked and
5 answered.

6 THE WITNESS: I'm uncomfortable
7 answering that question because I don't know -- I
8 don't know certainly. I don't know.

9 BY MS. DINKINS:

10 Q You don't know whether hemodilution
11 can affect the accuracy of blood typing results?

12 A I don't know, no, I don't know. I'm
13 not a blood specialist. I really don't know.

14 Q Do you expect anyone else besides WASH
15 will confirm a donor's blood type before the
16 donor's organs are removed?

17 A Ask that question in a different
18 manner.

19 Q Is there anyone besides WASH that you
20 expect will confirm a donor's blood type before
21 the donor's organs are procured?

22 A It happens, yes. Some transplant
23 centers do a confirmatory ABO prior to
24 transplantation.

25 Q And how do transplant centers do that?